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MEMO ENCLOSED

May 2, 2008

LEAD CASE  
04 CIV 7922  
(RJS) (JCF)

BY FAX

The Honorable James C. Francis IV  
United States Magistrate Judge  
United States District Court for the Southern District of New York  
500 Pearl Street – Room 1960  
New York, NY 10007

Re: Coburn, et al. v. City of New York, et al., 05 Civ. 7623 (RJS) (JCF);  
Phillips, et al. v. City of New York, et al., 05 Civ. 7624 (RJS) (JCF);  
Sloan, et al. v. City of New York, et al., 05 Civ. 7668 (RJS) (JCF);  
Galitzer v. City of New York, et al., 05 Civ. 7669 (RJS) (JCF);  
Bastidas, et al. v. City of New York, et al., 05 Civ. 7670 (RJS) (JCF);  
Xu, et al. v. City of New York, et al., 05 Civ. 7672 (RJS) (JCF);  
Sikelianos v. City of New York, et al., 05 Civ. 7673 (RJS) (JCF);  
Drescher v. City of New York, et al., 05 Civ. 7541 (RJS) (JCF);  
Manders, et al. v. City of New York, et al., 07 Civ. 7752 (RJS) (JCF);  
Jusick, et al. v. City of New York, et al., 07 Civ. 7683 (RJS) (JCF);  
Rigby v. City of New York, et al., 07 Civ. 7751 (RJS) (JCF)

DOCKET  
IN ALL  
LISTED  
CASES

Dear Judge Francis:

I write to respectfully request reconsideration of paragraph 14 of Your Honor's Order of April 18, 2008 (annexed hereto as **Exhibit A**), which denied plaintiffs' application to compel production of Police Officer Cordero's memo book with notations concerning duties related to the RNC unredacted.

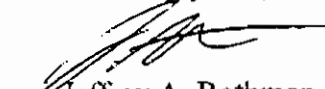
Your Honor's Order stated that "there has been no showing that it [the memo book] was improperly redacted." The Court, however, overlooked the fact that Plaintiffs stated on page 7 of their reply letter to the Court of March 14, 2008 that PO Cordero's memo book was heavily redacted and did not cover the entire RNC period. Plaintiffs also annexed as Exhibit K to that letter the redacted memo book portion produced by Defendants in the Sikelianos case, which only included the entries for August 31, 2004 and not for the other days during the RNC policing period or any training or other entries related to the RNC. PO Cordero's redacted memo book that was annexed to that letter as Exhibit K is annexed hereto as **Exhibit B**, for the Court's convenience.

It has long been law of the case in the RNC cases that memo books must be provided in such a manner that "notations concerning duties related to the RNC are not redacted." See, paragraph 1 of Your Honor's April 3, 2007 Order in the Coburn RNC case and the other RNC

Plaintiffs therefore respectfully request reconsideration of paragraph 14 of Your Honor's  
Order of April 18, 2008, and respectfully request that the Court compel production by May 16,  
2008 (the day other compliance with the Court's April 18<sup>th</sup> Order is due) of Police Officer  
Cordero's memo book with notations concerning duties related to the RNC unredacted.

I thank the Court for its consideration in this matter.

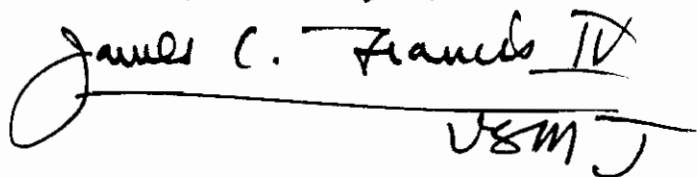
Sincerely yours,

  
Jeffrey A. Rothman  
[JR-0398]

cc: Fred Weiler, Esq. (by email)  
James Mirro, Esq. (by email)  
All RNC Counsel (by email)

5/8/08  
Application denied. There is  
still no basis for assuming that the  
redacted portions of the memo  
book contained relevant information.

SO ORDERED.

James C. Francis IV  
  
JCF